

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF WISCONSIN**

In re:

Wisconsin & Milwaukee Hotel LLC,

Debtor.

Case No. 24-21743-gmh  
Chapter 11

**NOVEMBER 2024 FEE STATEMENT OF RICHMAN & RICHMAN LLC  
AS COUNSEL TO DEBTOR**

Applicant:	Richman & Richman LLC
Counsel for:	Wisconsin & Milwaukee Hotel LLC
Period for compensation and reimbursement:	November 1, 2024 through November 30, 2024
Amount of compensation sought as actual, reasonable, and necessary:	\$28,776.50
Amount of reimbursement expenses sought as actual, reasonable, and necessary:	\$1,868.17
Total interim approval requested:	<b>\$30,664.67</b>

Dated this 10<sup>th</sup> day of December 2024.

**RICHMAN & RICHMAN**  
**Attorneys for the Debtor**

By: /s/ Michael P. Richman  
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Claire Ann Richman  
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# Richman & Richman LLC

122 W Washington Ave, Suite 850  
Madison, WI 53703-2732

# INVOICE

Invoice # 1221  
Date: 12/10/2024  
Due On: 01/09/2025

Wisconsin & Milwaukee Hotel LLC  
c/o Jackson Street Management LLC  
Attn: Mr. Edward G. Carow  
731 N. Jackson Street, Suite 420, Milwaukee WI53202

## Wisconsin & Milwaukee Hotel LLC/-2024.00023

### Chapter 11

#### Services

Type	Date	Notes	Timekeeper	Quantity	Rate	Total
Service	11/01/2024	1103 - Petition, Schedules & Financials: Returned Mail re: locate correct address (not found) and update COA; Update Matrix; file COA with Court.	KKH	1.60	\$195.00	\$312.00
Service	11/01/2024	1110 - Claim Management Issues: Continue review of file, proofs of claim, and objection to proofs of claim for revisions and updates to draft discovery requests to Computershare	DTF	1.20	\$195.00	\$234.00
Service	11/01/2024	1103 - Petition, Schedules & Financials: review and approve letter to court to change 5 addresses	CAR	0.10	\$575.00	\$57.50
Service	11/01/2024	1110 - Claim Management Issues: confirm filing of objection to Claim 2 and proper service of same	CAR	0.30	\$575.00	\$172.50
Service	11/01/2024	1110 - Claim Management Issues: Review mortgage and loan file to prepare summaries and chart applicable to Computershare claim in case	JOO	8.00	\$195.00	\$1,560.00
Service	11/01/2024	1108 - Employment, Billing & Compensation: T/conf w/F. DiCastrì re Mallery app and appraisal exchanges (.3); prep of memo to client team re DiCastrì call (.1)	MPR	0.40	\$750.00	\$300.00
Service	11/02/2024	1110 - Claim Management Issues: review each filed claim and confirm allowance and identification on claim	CAR	2.50	\$575.00	\$1,437.50

		chart, to include basis for objections to same (1.6); conference with MPR to discuss claim objections to Proofs of Claim Nos. 3, 4, 9, 11, 12, 14, and 17 and plan treatment (.9)				
Service	11/02/2024	1105 - Plan & Disclosures: Work on plan term sheet	MPR	2.30	\$750.00	\$1,725.00
Service	11/04/2024	1110 - Claim Management Issues: review Amended Motion to disallow late claims to be filed for filing with Court, including uploading issue with court	CAR	0.30	\$575.00	\$172.50
Service	11/04/2024	1110 - Claim Management Issues: Analyze claims to determine all late filed Proofs of Claim for filing objections	DTF	0.20	\$195.00	\$39.00
Service	11/04/2024	1103 - Petition, Schedules & Financials: Returned Mail re: review & sort; locate correct addresses.	KKH	1.00	\$195.00	\$195.00
Service	11/04/2024	1110 - Claim Management Issues: Prepare amended objection to claims of Cvent; Winter Service and Assa Abloy	YXC	2.50	\$195.00	\$487.50
Service	11/04/2024	1105 - Plan & Disclosures: Further work on plan term sheet (.6); prep of email response to questions on plan term sheet from E. Carow (.4)	MPR	1.00	\$750.00	\$750.00
Service	11/05/2024	1108 - Employment, Billing & Compensation: Draft proposed order on application to employ Lennhoff Consulting as appraiser	DTF	0.70	\$195.00	\$136.50
Service	11/05/2024	1103 - Petition, Schedules & Financials: review and approve for filing updated addresses for Ecolab and Canon and service to same	CAR	0.10	\$575.00	\$57.50
Service	11/05/2024	1103 - Petition, Schedules & Financials: Returned Mail re: Prepare & File Dec of Mailing; Prepare envelopes to re-serve docs	KKH	1.60	\$195.00	\$312.00
Service	11/05/2024	1112 - Debtor Meetings & Communications: participate in video conference meeting to discuss plan classes and provisions	CAR	1.20	\$575.00	\$690.00
Service	11/05/2024	1105 - Plan & Disclosures: Team zoom mtg re status and strategy, including plan and Lender term sheet	MPR	1.20	\$750.00	\$900.00
Service	11/05/2024	1108 - Employment, Billing & Compensation: Review and revise proposed order granting Application to	EMR	0.70	\$450.00	\$315.00

Employ Lennhoff Consulting as Appraiser for WMH.						
Service	11/06/2024	1108 - Employment, Billing & Compensation: Review, update, and finalize proposed order on application to employ Lennhoff consulting and prepare for court filing	DTF	0.40	\$195.00	\$78.00
Service	11/06/2024	1103 - Petition, Schedules & Financials: Returned Mail re: Locate correct addresses; prepare COA; prepare Dec of Mailing; prepare envelopes	KKH	2.00	\$195.00	\$390.00
Service	11/07/2024	1103 - Petition, Schedules & Financials: Review & Sort returned mail	KKH	0.20	\$195.00	\$39.00
Service	11/07/2024	1108 - Employment, Billing & Compensation: Prep of email reply to F. DiCastri and D. Ambrose re motion to pay Mallery admin expense claim	MPR	0.50	\$0.00	\$0.00
Service	11/08/2024	1105 - Plan & Disclosures: T/conf w/J. Jaeger re appraisal status and scope (.2); prep of reply to R. Bader email re appraisal (.5); t/conf w/M. Flaherty re appraisal status and WL issues (.1)	MPR	0.80	\$750.00	\$600.00
Service	11/10/2024	1110 - Claim Management Issues: review and discuss claims chart with MPR to discuss classes and disputed claim amounts	CAR	0.50	\$575.00	\$287.50
Service	11/10/2024	1105 - Plan & Disclosures: Work on revisions to plan term sheet	MPR	0.80	\$750.00	\$600.00
Service	11/11/2024	1108 - Employment, Billing & Compensation: Review October 2024 invoice, update and finalize R&R monthly fee statement for October 2024 with invoice, and prepare for filing with court (.4); draft proposed order conditionally approving October 2024 fee statement (.2)	DTF	0.60	\$195.00	\$117.00
Service	11/11/2024	1103 - Petition, Schedules & Financials: Returned Mail re: review and sort; assist AAB prepare COA and dec of mailing; prepare envelopes re: re-servicing doc 278 & 279	KKH	1.00	\$195.00	\$195.00
Service	11/11/2024	1103 - Petition, Schedules & Financials: review and approve Declaration of Mailing and Change of Address to be filed with court	CAR	0.10	\$575.00	\$57.50
Service	11/11/2024	1108 - Employment, Billing &	EMR	0.80	\$450.00	\$360.00

		Compensation: Finalize R&R's October invoice and review cover sheet to file monthly fee request according to Alternative Compensation Procedure.				
Service	11/12/2024	1105 - Plan & Disclosures: video conference with MPR and client team to discuss outstanding issues, including claim objections and plan provisions	CAR	0.80	\$575.00	\$460.00
Service	11/12/2024	1105 - Plan & Disclosures: Team status/ strategy re plan term sheet	MPR	0.80	\$750.00	\$600.00
Service	11/12/2024	1108 - Employment, Billing & Compensation: Prepare email to David Lennhoff, Attorney Chris Strohbehn, and WMH team providing copy of signed and entered order granting application to employ Lennhoff Consulting as appraiser/expert witness for WMH.	EMR	0.10	\$450.00	\$45.00
Service	11/13/2024	1103 - Petition, Schedules & Financials: Returned Mail re: review and sort return mail	KKH	0.20	\$195.00	\$39.00
Service	11/13/2024	1106 - Misc Motions & Court Hearings: Prepare preliminary draft motion to further extend exclusivity periods for filing Chapter 11 plan and soliciting acceptances thereto (1.8); prepare notice of motion to further extend exclusivity periods (.2)	DTF	2.00	\$195.00	\$390.00
Service	11/13/2024	1110 - Claim Management Issues: Review Computershare and UST objs to Mallery app and prep of email to client team re same	MPR	0.30	\$0.00	\$0.00
Service	11/13/2024	1106 - Misc Motions & Court Hearings: Review Objections of Computershare and the UST to Application for Allowance of Administrative Expenses for Mallery SC to address same.	EMR	0.70	\$0.00	\$0.00
Service	11/13/2024	1108 - Employment, Billing & Compensation: Review email from Jennifer Cordova regarding expanding duties of Sikich LLC as accountants for WMH (.2); begin working on supplemental application to employ Sikich including review of Sikich retention order (.3).	EMR	0.50	\$450.00	\$225.00
Service	11/13/2024	1105 - Plan & Disclosures: Prepare Disclosure Statement on behalf of WMH.	EMR	1.20	\$450.00	\$540.00
Service	11/14/2024	1105 - Plan & Disclosures: Prep of	MPR	1.10	\$750.00	\$825.00

		emails re draft appraisal (.1); virtual mtg w/D. Friedland re plan issues and other related pending matters (.2); further virtual mtg w/D. Friedland, J. Cordova and M. Flaherty re plan issues w/WL and other related pending matters (.8)				
Service	11/15/2024	1108 - Employment, Billing & Compensation: Read applications and objections to distinguish cases relied upon in arguments to object to application for allowance and payments of administrative claim of Mallory S.C.	JOO	6.40	\$0.00	\$0.00
Service	11/15/2024	1110 - Claim Management Issues: Prep of email to N. Brown re WL plan to pay bonuses	MPR	0.20	\$750.00	\$150.00
Service	11/15/2024	1108 - Employment, Billing & Compensation: Prepare proposed order granting EA Group's first interim fee application.	EMR	0.40	\$450.00	\$180.00
Service	11/15/2024	1102 - Case Administration / US Trustee: Review Court's Sua Sponte order on service issues; address with firm.	EMR	0.80	\$0.00	\$0.00
Service	11/17/2024	1105 - Plan & Disclosures: Prep of motion to extend exclusivity	MPR	2.00	\$750.00	\$1,500.00
Service	11/18/2024	1103 - Petition, Schedules & Financials: Prepare COA re: returned mail and fixing court matrix	KKH	0.20	\$195.00	\$39.00
Service	11/18/2024	1108 - Employment, Billing & Compensation: Review court's docket text order re: service of order approving Eisner fees to confirm all details and compliance with service of same on creditors per court order	DTF	0.30	\$0.00	\$0.00
Service	11/18/2024	1103 - Petition, Schedules & Financials: review and approve address change to be filed with court (.1); review court order regarding service of documents and confirm necessary process to resolve same (.5)	CAR	0.60	\$575.00	\$345.00
Service	11/18/2024	1106 - Misc Motions & Court Hearings: Finalize notice and motion to extend exclusivity period to file plan for court filing and service on creditors, ensuring compliance with court orders	DTF	0.50	\$195.00	\$97.50
Service	11/18/2024	1102 - Case Administration / US Trustee: Review Objections to Motion to	JES	1.40	\$0.00	\$0.00

Pay Mallery Admin Claims						
Service	11/18/2024	1108 - Employment, Billing & Compensation: Research on cases and distinguish from application for allowance and payment of administrative claim of Mallery S.C. and objections to application for allowance and payment of administrative claim.	JOO	7.00	\$0.00	\$0.00
Service	11/18/2024	1105 - Plan & Disclosures: Review and prepare final edits to motion to extend exclusivity	MPR	1.00	\$750.00	\$750.00
Service	11/18/2024	1105 - Plan & Disclosures: Finalize Motion Further Extending Exclusivity Periods (.4); Work on Disclosure Statement (.8).	EMR	1.20	\$450.00	\$540.00
Service	11/19/2024	1106 - Misc Motions & Court Hearings: Review certificate of service from Stretto on motion to further extend exclusivity period to ensure accuracy and compliance with court orders and prepare for filing	DTF	0.20	\$0.00	\$0.00
Service	11/19/2024	1103 - Petition, Schedules & Financials: Returned Mail re: prepare dec of mailing for re-serving doc 282; prepare envelopes for re-serving	KKH	0.60	\$195.00	\$117.00
Service	11/19/2024	1108 - Employment, Billing & Compensation: Research and write on case to be used for reply on objection to application for allowance and payment of administrative claims	JOO	6.00	\$0.00	\$0.00
Service	11/19/2024	1108 - Employment, Billing & Compensation: Prepare Omnibus Response to Objections to Motion to pay Mallery Admin Fee	JES	2.50	\$0.00	\$0.00
Service	11/19/2024	1105 - Plan & Disclosures: Teams mtg w/D. Friedland re appraisal questions (.2); review draft appraisal (.5); client weekly zoom meeting re status/strategy, including plan issues (.5)	MPR	1.20	\$750.00	\$900.00
Service	11/19/2024	1108 - Employment, Billing & Compensation: Conduct legal research to assist with preparing omnibus reply to Computershare and UST's objections to Mallery SC's Application for Administrative Expense Claim.	EMR	0.50	\$0.00	\$0.00
Service	11/19/2024	1108 - Employment, Billing & Compensation: Draft Supplemental	EMR	1.30	\$450.00	\$585.00



		Application to Employ Sikich LLC (1.0); prepare email to Jennifer Cordova forwarding same for her review and requesting additional information to complete Supplemental Application (.2).				
Service	11/19/2024	1103 - Petition, Schedules & Financials: review and approve service on corrected address for creditors Doc 282	CAR	0.10	\$575.00	\$57.50
Service	11/20/2024	1108 - Employment, Billing & Compensation: Prepare revisions to Omnibus Response to Objections to Mallory Admin Claim App	JES	1.60	\$0.00	\$0.00
Service	11/20/2024	1108 - Employment, Billing & Compensation: Legal research re disinterestedness standard for attorney retained to provide information to general bankruptcy counsel	JES	3.70	\$0.00	\$0.00
Service	11/20/2024	1103 - Petition, Schedules & Financials: Returned Mail re: Discuss return mail with DTF and prepare COA for returned mail creditor (Town Bank & White Lodging)	KKH	0.70	\$195.00	\$136.50
Service	11/20/2024	1108 - Employment, Billing & Compensation: Work on omnibus reply to objs to payment of Mallory admin expense claim (1.0)	MPR	1.00	\$0.00	\$0.00
Service	11/20/2024	1105 - Plan & Disclosures: t/conf w/J. Jaeger re draft appraisal	MPR	0.40	\$750.00	\$300.00
Service	11/20/2024	1108 - Employment, Billing & Compensation: Phone call with Jordan Vorlob at Sikich LLC to obtain additional information needed for Supplemental Application to Employ Sikich LLC as accountants for WMH (.3); prepare further revisions to Supplemental Application and Supplemental Declaration (.8); prepare email to Sikich Team and WMH Team forwarding pleadings for review (.2).	EMR	1.30	\$450.00	\$585.00
Service	11/20/2024	1103 - Petition, Schedules & Financials: review and approve for filing change of address for Town Bank	CAR	0.10	\$575.00	\$57.50
Service	11/21/2024	1103 - Petition, Schedules & Financials: Finalize October 2024 MOR form with all supporting documentation to complete for client signature and filing with court.	DTF	0.50	\$195.00	\$97.50
Service	11/21/2024	1105 - Plan & Disclosures: review	MPR	1.10	\$750.00	\$825.00

appraisal questions w/D. Friedland						
Service	11/21/2024	1108 - Employment, Billing & Compensation: work on combined reply to objs to Mallery admin expense claim	MPR	0.80	\$0.00	\$0.00
Service	11/21/2024	1110 - Claim Management Issues: Receive and review Order Applying Rule 26 and Requiring Rule 26(f) Report on Objection to Proof of Claim of White Lodging to note dates and deadlines for same.	EMR	0.20	\$450.00	\$90.00
Service	11/22/2024	1103 - Petition, Schedules & Financials: CW EMR re: returned mail; returned mail re: prep COA for filing	KKH	0.50	\$195.00	\$97.50
Service	11/22/2024	1108 - Employment, Billing & Compensation: further work on combined reply to objs to Mallery admin expense claim	MPR	0.50	\$0.00	\$0.00
Service	11/22/2024	1112 - Debtor Meetings & Communications: T/conf w/M. Flaherty re WL meetings and related issues (.2); zoom meeting w/client team, D. Friedland and J. Jaeger (1.2)	MPR	1.40	\$750.00	\$1,050.00
Service	11/25/2024	1105 - Plan & Disclosures: Work on disclosure statement.	EMR	1.50	\$450.00	\$675.00
Service	11/25/2024	1108 - Employment, Billing & Compensation: Further work on combined reply to objs to Mallery app	MPR	1.20	\$0.00	\$0.00
Service	11/26/2024	1105 - Plan & Disclosures: Review Lender obj to motion to extend exclusivity, and prep of email to client team re same (.2); client team zoom re plan and exclusivity, related issues and strategies (.6); followup t/conf w/D. Friedland re same (.1); further work on plan term sheet and related research (.8)	MPR	1.70	\$750.00	\$1,275.00
Service	11/26/2024	1106 - Misc Motions & Court Hearings: Review Judge Halfenger's opinion and order on Mallery S.C.'s Application for Administrative Expense Claim and MPR's email to WMH team to stay apprised of status of same.	EMR	0.30	\$0.00	\$0.00
Service	11/26/2024	1108 - Employment, Billing & Compensation: Prepare email to Jennifer Cordova and Sikich LLC team to follow up on review of Supplemental Application to employ Sikich LLC as accountants for WMH.	EMR	0.10	\$450.00	\$45.00

Service	11/26/2024	1105 - Plan & Disclosures: Review Computershare's objection to WMH's Motion to Further Extend Exclusivity Period to address same.	EMR	0.30	\$450.00	\$135.00
Service	11/26/2024	1105 - Plan & Disclosures: Work on Disclosure Statement.	EMR	3.00	\$450.00	\$1,350.00
Service	11/27/2024	1108 - Employment, Billing & Compensation: Conduct email exchange with Jordan Vorlob at Sikich and Jennifer Cordova regarding finalizing and filing Supplemental Application to Employ Sikich.	EMR	0.30	\$450.00	\$135.00
Service	11/27/2024	1105 - Plan & Disclosures: Work on Disclosure Statement.	EMR	0.80	\$450.00	\$360.00
Service	11/27/2024	1105 - Plan & Disclosures: Further work on plan term sheet	MPR	0.80	\$750.00	\$600.00
				<b>Quantity Subtotal</b>		<b>100.5</b>
				<b>Services Subtotal</b>		<b>\$28,776.50</b>

**Expenses**

Type	Date	Notes	Quantity	Rate	Total
Expense	10/03/2024	Copy Expense: Stretto Copy/Printing Expense: Notice of First Interim Application for Allowance and Payment of Fees and Expenses incurred by Richman & Richman LLC (Doc 252)	309.00	\$0.15	\$46.35
Expense	10/03/2024	Postage Expense: Stretto Postage Expense: Notice of First Interim Application for Allowance and Payment of Fees and Expenses incurred by Richman & Richman LLC (Doc 252)	103.00	\$0.69	\$71.07
Expense	10/15/2024	Copy Expense: Stretto Copy/Printing Expense: Application of the Debtor for Authority to Employ Lennhoff Real Estate Consulting as Expert Witness (Doc 269) and Notice of Application to Employ Lennhoff Real Estate Consulting (Doc 270)	5,940.00	\$0.15	\$891.00
Expense	10/15/2024	Postage Expense: Stretto Postage Expense: Application of the Debtor for Authority to Employ Lennhoff Real Estate Consulting as Expert Witness (Doc 269) and Notice of Application to Employ Lennhoff Real Estate Consulting (Doc 270)	1.00	\$297.81	\$297.81
Expense	10/23/2024	Copy Expense: Stretto Copy/Printing Expense: Application Pursuant to 11 USC 503(b)(1)(A) for Allowance and Payment of Administrative Claim of Mallory S.C. (Doc 278) and Notice of Application for Allowance and Payment of Administrative Claim of	1,980.00	\$0.15	\$297.00

## Allery S.C. (Doc 279)

Expense	10/23/2024	Postage Expense: Stretto Potage Expense: Application Pursuant to 11 USC 503(b)(1)(A) for Allowance and Payment of Administrative Claim of Mallery S.C. (Doc 278) and Notice of Application for Allowance and Payment of Administrative Claim of Allery S.C. (Doc 279)	1.00	\$133.85	\$133.85
Expense	10/24/2024	Copy Expense: Stretto Copy/Printing Expense: Notice of Interim Application for Allowance of Fees and Costs by Professional: Eisner Advisory Group LLC (Doc 282)	198.00	\$0.15	\$29.70
Expense	10/24/2024	Postage Expense: Stretto Postage Expense: Notice of Interim Application for Allowance of Fees and Costs by Professional: Eisner Advisory Group LLC (Doc 282)	1.00	\$70.23	\$70.23
Expense	11/05/2024	Postage Expense: Postage expense for re-serving Docs 15-16, 18-22, 24-26, 46, 56-58, 73-74, 85, 112, 119-123, 165-167, 195-196, 224, and 252 to Canon Solutions America and Ecolab Pest Elimination	2.00	\$3.71	\$7.42
Expense	11/05/2024	Postage Expense: Postage re: re-serving Doc 269 & Doc 270 of returned mail to 4 creditors	4.00	\$2.87	\$11.48
Expense	11/11/2024	Postage Expense: Postage expense: Reservice of Docs 278 and 279	1.00	\$9.39	\$9.39
Expense	11/12/2024	Postage Expense: Postage Expense To Reservice Docs 269-270 To Ecolab.	1.00	\$2.87	\$2.87
<b>Expenses Subtotal</b>					<b>\$1,868.17</b>

Time Keeper	Position	Quantity	Rate	Total
Eliza Reyes	Associate	13.7	\$450.00	\$6,165.00
Eliza Reyes	Associate	2.3	\$0.00	\$0.00
Claire Richman	Partner	6.7	\$575.00	\$3,852.50
Michael Richman	Partner	18.2	\$750.00	\$13,650.00
Michael Richman	Partner	4.3	\$0.00	\$0.00
James Soo	Associate	9.2	\$0.00	\$0.00
Yabing Chong	Law Clerk	2.5	\$195.00	\$487.50
David Fowle	Paralegal	6.1	\$195.00	\$1,189.50
David Fowle	Paralegal	0.5	\$0.00	\$0.00
Kiranpreet Hayer	Paralegal	9.6	\$195.00	\$1,872.00

Jude Odibeli	Law Clerk	8.0	\$195.00	\$1,560.00
Jude Odibeli	Law Clerk	19.4	\$0.00	\$0.00
<b>Quantity Total</b>				<b>100.5</b>
<b>Subtotal</b>				<b>\$30,644.67</b>
<b>Total</b>				<b>\$30,644.67</b>

ALL BILLS DUE & PAYABLE UPON RECEIPT UNLESS ARRANGEMENTS ARE MADE WITH COUNSEL.

Please make all amounts payable to: Richman & Richman LLC

**Check/Cash Payments:** Mail to 122 W. Washington Ave., Suite 850, Madison, WI 53703-2732

**Credit Card Payments:** Via LawPay at [www.RandR.law](http://www.RandR.law) (or attached link)

**Wire Instructions:** Account Name: Richman & Richman LLC (General Checking)  
 Account Address: 122 W. Washington Ave., Suite 850, Madison, WI 53703-2732  
 Bank Name and Address: BMO Harris Bank  
 ABA: 071025661 SWIFT Code HARTUS44 Acct No. 4838178298